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SO ORDERED. WWW.SHIRIANPC.COM

MARK D. SHIRIAN MSHIRIAN@SHIRIANPC.COM **United States District Judge**

August 2, 2023

VIA CM/ECF

Hon. Jennifer L. Rochon, U.S. District Judge U.S. District Court for the Southern District of New York 500 Pearl Street, Room 1920 New York, NY 10007

> Re: Tzur v. Henkel of America, Inc. et al Civil Case No.: 1:23-cv-02923

The requests are GRANTED. Plaintiff's opposition to the motion to dismiss is adjourned to October 24, 2023, and Defendants' reply is due November 7, **2023**. In light of the parties' ongoing settlement discussions, and because all parties consent, the Initial Pretrial Conference is adjourned to November 14, 2023 at 11:30 a.m.

Dated: August 3, 2023 New York, New York

Dear Judge Rochon:

cc:

My office represents Plaintiff Mira Tzur. I write to respectfully request an extension of time to October 24, 2023 to respond to Defendants' motions to dismiss (Document Nos. 19 and 21), which presently are due on August 17, 2023. I make this request because the parties appeared for a settlement conference on July 24, 2023 before Hon. Jennifer E. Willis. Although the parties have not yet resolved this matter, progress was made. The parties have scheduled a second settlement conference before Judge Willis for October 10, 2023. The Defendants consent to this request. Additionally, the Defendants respectfully request two weeks to submit replies, which would be due on November 7, 2023. The Plaintiff consents to this request.

Additionally, the parties are scheduled to appear for an Initial Pretrial Conference on August 16, 2023. In light of Defendants' motions to dismiss and the second settlement conference, the parties respectfully request an adjournment of the Initial Pretrial Conference to a date after briefing of the motions is complete.

Thank you for your consideration of this request.

Respectfully submitted,

Mark D. Shirian

All attorneys of record (via ECF service)